

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

CANATELO, LLC
Plaintiff,

v.

**UNITED TECHNOLOGIES
CORPORATION; INTERLOGIX, INC.;
UTC FIRE & SECURITY
CORPORATION AND UTC FIRE &
SECURITY AMERICAS
CORPORATION, INC.**

Defendants.

CIVIL NUM.:

**PLAINTIFF REQUESTS TRIAL BY
JURY**

PATENT INFRINGEMENT

COMPLAINT FOR INFRINGEMENT OF PATENT

TO THE HONORABLE COURT:

COMES NOW, Plaintiff Canatelo, LLC (“Canatelo”), through the undersigned attorneys, and respectfully alleges, states, and prays as follows:

NATURE OF THE ACTION

1. This is an action for patent infringement under the Patent Laws of the United States, Title 35 of the United States Code (“U.S.C.”) to prevent and enjoin Defendants United Technologies Corporation; Interlogix, Inc., subsidiary of UTC Fire & Security; UTC Fire & Security Corporation, subsidiary of United Technologies Corporation; and UTC Fire & Security Americas Corporation, Inc., a subsidiary of United Technologies Corporation (collectively “Defendants”) from infringing and profiting, in an illegal and unauthorized manner and without authorization and/or consent from Plaintiff, from U.S. Patent Nos. 7,310,111 (the “111 patent”) and 6,476,858 (the “858 patent”) pursuant to 35 U.S.C. §271, and to recover damages, attorneys fees, and costs.

JURISDICTION AND VENUE

2. The Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§1331 and 1338(a).
3. Venue lies in this judicial district pursuant to 28 U.S.C. §§1391 and 1400(b).
4. Upon information and belief, Defendants have conducted and do conduct business within the Commonwealth of Puerto Rico, directly or through intermediaries, resellers or agents, sells, offers for sale, advertises (including the use of web pages with promotional material) products or services, or uses or induces others to use services or products in Puerto Rico that infringe the '111 and '858 patents, (collectively, the "Asserted Patents") or knowingly contribute to infringement of the Asserted Patents.
5. In addition to the Defendants' continuously and systematically conducting business in Puerto Rico, the cause of action against Defendant arises from (but is not limited to) the Defendants' purposeful acts of patent infringement committed in Puerto Rico, including Defendants' making, using, importing, offering for sale, or selling video-based security systems which include features that fall within the scope of at least one claim of the Asserted Patents.
6. Interlogix and UTC Fire & Security regularly conduct business in the Commonwealth of Puerto Rico, including with a company registered and licensed to do business in the Commonwealth. Interlogix actively offers to sell, sells, and advertises in Puerto Rico through specifically authorized and associated resellers. For example, its website specifically directs prospective customers from Puerto Rico to an authorized reseller incorporated in the Commonwealth.

7. United Technologies Corporation maintains regular and systematic contacts with Puerto Rico, including by maintaining registered agents for multiple subsidiary companies and maintaining offices and employees within the Commonwealth.
8. Canatelo is owned by a local Puerto Rican entrepreneur and founder of multiple start-ups. Thus, the current owner of the Asserted Patents has availed himself of legal rights, duties and obligations within the district. Canatelo acquired the patents as a way to further incentivize local innovation.
9. Upon information and belief, at the time of the invention all three inventors of the '111 and '858 patents were residing in Puerto Rico. Thus, the patent grew out of invention and innovation that took place within Puerto Rico.

THE PARTIES

10. Plaintiff Canatelo is a Puerto Rico limited liability company with its principal place of business at Martinal Plaza Aldea St. 1414, Suite 402, San Juan, Puerto Rico 00907.
11. Upon information and belief, Defendant United Technologies Corporation is a Delaware corporation with its principal place of business at One Financial Plaza, Hartford, CT 06103.
12. Upon information and belief, Defendant UTC Fire & Security Corporation, subsidiary of United Technologies, is a Delaware company with a principal place of business at 9 Farm Springs Road, Farmington, CT 06032-4065.
13. Upon information and belief, Defendant UTC Fire & Security Americas Corporation, Inc., a subsidiary of United Technologies, is a Delaware company with a principal place of business at 1275 Red Fox Road, Suite 100, Arden Hills, MN 55112.

14. Upon information and belief, Defendant Interlogix, Inc., a subsidiary of UTC Fire & Security, is a Delaware company with a principal place of business at 8985 Town Center Pkwy Bradenton, FL 34202.

FACTUAL ALLEGATIONS

15. On December 18, 2007, the United States Patent and Trademark Office (“USPTO”) duly and legally issued the ‘111 patent, entitled “Video monitoring and security system” after a full and fair examination. A true and correct copy of the ‘111 patent is attached hereto as Exhibit “A”. Canatelo is presently the owner of the patent, having received all right, title and interest in and to the ‘111 patent from the previous assignee of record, Innovation Institute, a Puerto Rican-based research and development company. Canatelo possesses all rights of recovery under the ‘111 patent, including the exclusive right to recover for past infringement. The ‘111 patent is valid and enforceable.
16. On November 11, 2002, the United States Patent and Trademark Office (“USPTO”) duly and legally issued the ‘858 patent, entitled “Video monitoring and security system” after a full and fair examination. A true and correct copy of the ‘858 patent is attached hereto as Exhibit “B”. Canatelo is presently the owner of the patent, having received all right, title and interest in and to the ‘858 patent from the previous assignee of record, Innovation Institute, a Puerto Rican-based research and development company. Canatelo possesses all rights of recovery under the ‘858 patent, including the exclusive right to recover for past infringement. The ‘858 patent is valid and enforceable.
17. Defendants make, use, sell, offer to sell and/or import network cameras including TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P);

and TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P.

18. Defendants make, use, sell, offer to sell and/or import video recorders including TruVision NVR 20 and TruVision DVR 60.
19. Defendants sell, offer to sell and/or import one or more of the above cameras and video recorders within the Commonwealth of Puerto Rico.
20. TruVision NVR 20 and TruVision DVR 60 video recorders include multiple video inputs that receive signals from video cameras.
21. TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); and TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P include a video camera that generates a video signal.
22. TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P; and TruVision NVR 20 and TruVision DVR 60 video recorders include a built-in microprocessor, memory and software for performing various functions in relation to video signals.

23. TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P; and TruVision DVR 60 video recorders have the ability to detect motion in a camera's field of view.
24. TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P; and TruVision DVR 60 video recorders have the ability to exclude specific areas of the connected camera's field of view from motion detection and surround specific excluded areas with active areas where motion is detected.
25. TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P; and TruVision DVR 60 video recorders have the

ability to surround specific excluded areas where motion is not detected with active areas where motion is detected.

26. TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P; and TruVision NVR 20 and TruVision DVR 60 video recorders have the ability to send e-mail to a pre-designated e-mail address when motion is detected.

27. TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P; and TruVision NVR 20 and TruVision DVR 60 video recorders have the ability to include compressed video images in emails sent to the pre-designated e-mail address.

28. TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P);

TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P; and TruVision NVR 20 and TruVision DVR 60 video recorders have the ability to transmit alarm messages, such as transmitting electrical signals containing instructions and/or computer readable signals, instructing computer components to record and store camera images, and providing cues to alert human operators.

DIRECT INFRINGEMENT

29. Plaintiff realleges and incorporates by reference the allegations set forth in paragraphs 15-28.
30. Taken together, either partially or entirely, the features included in TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P; and TruVision DVR 60 video recorders include each of the elements recited in at least Claims 1-10 of the '111 Patent.
31. TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P; and TruVision DVR 60 video recorders perform each of the steps recited in at least Independent Claim 13 of the '111 Patent.

32. Taken together, either partially or entirely, the features included in TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); and TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P include each of the elements recited in at least Independent Claim 26 of the '858 Patent.
33. Taken together, either partially or entirely, the TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P; and TruVision DVR 60 video recorders perform each of the steps recited in at least Claims 28-30 and 37 of the '858 Patent.
34. Defendants directly infringe at least Claims 1-10 and 13 of the '111 Patent by using, selling, offering to sell and/or importing the TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); TruVision Megapixel

IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P; and TruVision DVR 60 video recorders in violation of 35 U.S.C. § 271(a).

35. Defendants directly infringe at least Claims 28-30 and 37 of the '858 Patent by using, selling, offering to sell and/or importing the TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P; and TruVision DVR 60 video recorders in violation of 35 U.S.C. § 271(a).

36. Additionally, Defendants directly infringe at least Claims 26 of the '858 Patent by using, selling, offering to sell and/or importing the TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); and TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P in violation of 35 U.S.C. § 271(a).

INDUCING INFRINGEMENT

37. Plaintiff realleges and incorporates by reference the allegations set forth in paragraphs 15-36.

38. Defendants have had knowledge of the Asserted Patents and therefore of their infringement at least as of service of the present Complaint.

39. Defendants indirectly infringe at least Claims 1-10 and 13 of the '111 Patent by actively inducing its customers to infringe on the '111 Patent at least by using any of TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P; and TruVision NVR 20 and TruVision DVR 60 video recorders in violation of 35 U.S.C. § 271(b).

40. Defendants indirectly infringe at least Claims 26, 28-30 and 37 of the '858 Patent by actively inducing its customers to infringe on the '858 Patent at least by using any of TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P; and TruVision NVR 20 and TruVision DVR 60 video recorders in violation of 35 U.S.C. § 271(b).

CONTRIBUTORY INFRINGEMENT

41. Plaintiff realleges and incorporates by reference the allegations set forth in paragraphs 15-40.

42. TruVision NVR 20 and TruVision DVR 60 video recorders are components of a patented machine covered by one or more of Claims 1-10 of the '111 Patent, constitute a material part of the invention and are not a staple article or commodity of commerce.
43. TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P; and TruVision NVR 20 and TruVision DVR 60 video recorders are apparatuses for use in practicing a patented process covered by at least Claim 13 of the '111 Patent, constitute a material part of the invention and are not a staple article or commodity of commerce.
44. TruVision NVR 20 and TruVision DVR 60 video recorders are components of a patented machine covered by one or more of Claims 1-26 of the '858 Patent, constitute a material part of the invention and are not a staple article or commodity of commerce.
45. TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P; and TruVision NVR 20 and TruVision DVR 60 video recorders are apparatuses for use in practicing a patented process covered by one or more of Claims 28-37 of the '858 Patent, constitute a material part of the invention and are not a staple article or commodity of commerce.

46. Defendants have known TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P; and TruVision NVR 20 and TruVision DVR 60 video recorders were especially designed or especially adapted for use in infringement of the '111 and 858 Patents at least as of service of the present Complaint.

47. Defendants contribute to the infringement of one or more of Claims 1-10 and 13 of the '111 Patent by offering to sell, selling and/or importing TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P; and TruVision NVR 20 and TruVision DVR 60 video recorders in violation of 35 U.S.C. § 271(c).

48. Defendants contribute to the infringement of one or more of Claims 1-37 of the '858 Patent by offering to sell, selling and/or importing TruVision IP Dome Open Standards Cameras including models TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards

camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P; and TruVision NVR 20 and TruVision DVR 60 video recorders in violation of 35 USC 271(c).

49. Defendants contributes to the direct infringement by others of one or more claims of the Asserted Patents in violation of 35 U.S.C. § 271(c). The class of such direct infringers includes, but is not limited to, the purchasers of Defendants' TVD-N210V-2-N(-P), TVD-M1210V-2-N(-P), TVD-M2210V-2-N(-P), TVD-M3210V-2-N(-P), TVD-N245V-2-N(-P), TVD-M1225V-2-N(-P), TVD-M2225V-2-N(-P), TVD-M3225V-2-N(-P), TVD-M5225V-4-N(-P), TVD-N210W-4-N(-P), and TVD-M2210W-4-N(-P); TruVision IP Cam Open Standards camera models TVC-N220-1-N(-P), TVC-N240-1-N(-P), TVC-M1220-1-N(-P), TVC-M2220-1-N(-P), TVC-M3220-1-N(-P), and TVC-M5220-1-N(-P); TruVision Megapixel IP Camera models TVC-M1120-1-N, TVC-M1120-1-P, TVC-M2110-1-N, and TVC-M2110-1-P; and TruVision NVR 20 and TruVision DVR 60 video recorders.

DEMAND FOR JURY TRIAL

Canatelo demands a trial by jury of any and all causes of action.

PRAYER FOR RELIEF

WHEREFORE, Canatelo prays for the following relief:

1. That Defendants be adjudged to have infringed the '111 and '858 patents, directly and/or indirectly, by way of inducement and/or contributory infringement, literally and/or under the doctrine of equivalents;

2. That Defendants, their officers, directors, agents, servants, employees, attorneys, affiliates, divisions, branches, parents, and those persons in active concert or participation with any of them, be preliminarily and permanently restrained and enjoined from directly and/or indirectly infringing the '111 and '858 patents;
3. An award of damages pursuant to 35 U.S.C. § 284 sufficient to compensate Canatelo for the Defendants' past infringement and any continuing or future infringement up until the date that Defendants are finally and permanently enjoined from further infringement, including compensatory damages;
4. An assessment of pre-judgment and post-judgment interest and costs against Defendants, together with an award of such interest and costs, in accordance with 35 U.S.C. § 284;
5. That Defendants be directed to pay enhanced damages, including Canatelo's attorneys' fees incurred in connection with this lawsuit pursuant to 35 U.S.C. § 285; and
6. That Canatelo have such other and further relief as this Court may deem just and proper.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 4th day of June, 2012.

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